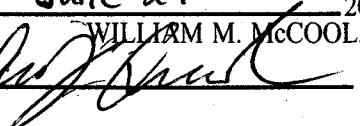


1 Presented to the Court by the foreman of the
2 Grand Jury in open Court, in the presence of
3 the Grand Jury and FILED in the U.S.
4 DISTRICT COURT at Seattle, Washington.

5 June 27 2018
6 WILLIAM M. McCOOL, Clerk
7 By  Deputy
8

9
10 UNITED STATES DISTRICT COURT FOR THE
11 WESTERN DISTRICT OF WASHINGTON
12 AT TACOMA
13

14 UNITED STATES OF AMERICA,
15 Plaintiff,

16 NO. **C R 18 - 5363 RJB**

17 **INDICTMENT**

18 v.
19 PAUL MICHEAL BERGIN,
20 Defendant.

21 The Grand Jury charges that:

22 **COUNT 1**

23 **(Enticement of a Minor)**

24 Between November and December of 2017, at Tacoma, within the Western
25 District of Washington, and elsewhere, PAUL MICHEAL BERGIN, used a facility and
26 means of interstate and foreign commerce, including the internet, to knowingly persuade,
27 induce, entice, and coerce MV1, an individual who had not yet attained the age of 18
28 years, to engage in sexual activity for which any person can be charged with a criminal
offense—to include, the production of child pornography as defined in 18 U.S.C.
§ 2256(8)—and attempted to do so.

All in violation of Title 18, United States Code, Sections 2422(b) and 2427.

1 **ALLEGATIONS OF FORFEITURE**

2 The allegations contained in Count 1 of this Indictment are hereby realleged and
3 incorporated by reference for the purpose of alleging forfeitures to the United States
4 pursuant to Title 18, United States Code, Section 2428(a).

5 Upon conviction of the offense alleged in Count 1 of this Indictment, the
6 defendant, PAUL MICHEAL BERGIN, shall forfeit to the United States any property,
7 real or personal, used or intended to be used to commit or to promote the commission of
8 such offense, or any property traceable to such property; any property, real or personal,
9 constituting or traceable to gross profits or other proceeds obtained from such offense,
10 including but not limited to the following:

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1 a. One white Motorola cell phone seized from PAUL MICHEAL BERGIN on
2 or about June 7, 2018.

A TRUE BILL:

DATED: 6-27-18

(signature of the foreperson redacted pursuant to the policy of the Judicial Conference of the United States)

FOREPERSON

ANNETTE L. HAYES
United States Attorney

~~KATHERYN KIM FRIERSON~~
Assistant United States Attorney

MATTHEW P. HAMPTON
Assistant United States Attorney